

GIBSON, DUNN & CRUTCHER LLP  
JAMES P. FOGELMAN, SBN 161584  
jfogelman@gibsondunn.com  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7234  
Facsimile: 213.229.6234

MATTHEW S. KAHN, SBN 261679  
mkahn@gibsondunn.com  
JENNA M. YOTT, SBN 251901  
jyott@gibsondunn.com  
JOANNA L. POWELL, SBN 294427  
jpowell@gibsondunn.com  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-0921  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

Attorneys for Defendants CROWN ACQUISITIONS,  
INC., CROWN RETAIL SERVICES, LLC, CROWN  
RETAIL SERVICES, INC., BRITTANY HEATHER  
BRAGG, HAIM S. CHERA, and RICHARD S. CHERA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

LAUREN SMITH-HAMS DRESSLER,

Plaintiff,

v.

CROWN ACQUISITIONS, INC., CROWN  
RETAIL SERVICES, LLC, CROWN RETAIL  
SERVICES, INC., BRITTANY HEATHER  
BRAGG, HAIM S. CHERA, RICHARD S.  
CHERA and DOES 1-10,

Defendants.

CASE NO. 15-5330

**DECLARATION OF MATTHEW S. KAHN  
IN SUPPORT OF NOTICE OF REMOVAL**

*[Removal from the Superior Court of California  
for the City and County of San Francisco, Case  
No. CGC-15-548565]*

1 I, Matthew S. Kahn, declare as follows:

2 1. I am an attorney admitted to practice law before all courts of the State of California  
3 and in the United States District Court for the Northern District of California. I am a partner in the  
4 law firm of Gibson, Dunn & Crutcher LLP, and I am counsel of record for Defendants Crown  
5 Acquisitions, Inc.; Crown Retail Services LLC; Crown Retail Services, Inc.; Brittany Heather Bragg;  
6 Haim S. Chera; and Richard S. Chera (“Defendants”) in this matter. Unless otherwise stated, the  
7 following facts are within my personal knowledge and, if called and sworn as a witness, I could and  
8 would testify competently thereto.

9 2. Attached hereto as **Exhibit A** is a true and correct copy of the Summons in *Lauren*  
10 *Smith-Hams Dressler v. Crown Acquisitions, Inc., Crown Retail Services, LLC, Crown Retail*  
11 *Services, Inc., Brittany Heather Bragg, Haim S. Chera, Richard S. Chera, and Does 1-10*, Case No.  
12 CGC-15-548565 (“*Dressler v. Crown*”), issued on October 21, 2015, in the Superior Court of  
13 California for the City and County of San Francisco.

14 3. Attached hereto as **Exhibit B** is a true and correct copy of the Complaint filed in  
15 *Dressler v. Crown* on October 21, 2015, in in the Superior Court of California for the City and  
16 County of San Francisco.

17 4. Attached hereto as **Exhibit C** is a true and correct copy of the Civil Case Cover  
18 Sheet filed in *Dressler v. Crown* on October 21, 2015, in the Superior Court of California for the City  
19 and County of San Francisco.

20 5. Attached hereto as **Exhibit D** is a true and correct copy of the Notice to Plaintiff  
21 Regarding Case Management Conference issued in *Dressler v. Crown* on October 21, 2015, in the  
22 Superior Court of California for the City and County of San Francisco.

23 6. Attached hereto as **Exhibit E** is a true and correct copy of Plaintiff’s Demand for  
24 Jury Trial filed in *Dressler v. Crown* on October 22, 2015, in the Superior Court of California for the  
25 City and County of San Francisco.

7. Attached hereto as **Exhibit F** is a true and correct copy of the Answer filed in *Dressler v. Crown* on November 19, 2015, in the Superior Court of California for the City and County of San Francisco.

8. Attached hereto as **Exhibit G** is a true and correct copy of the Summons in *Dressler v. Crown* that, on information and belief pursuant to the signature of the process server, was served on Defendants on October 26, 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day of November 20, 2015 in San Francisco, California.

By: /s/ Matthew S. Kahn  
Matthew S. Kahn